



**THE CITY OF NEW YORK
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VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Aitabdella Salem v. City of New York, et al.,
17-CV-4799 (JGK)

Your Honor:

I am a Senior Counsel and the attorney for defendants City of New York and Commissioner Joseph Ponte (hereinafter “City Defendants”) in the above-referenced matter. City Defendants write to respectfully request permission to file a reply memorandum of law with 2,000 additional words beyond the word limitation set forth in Your Honor’s Individual Practices. Counsel for plaintiff consents to this request.

Plaintiff’s Second Amended Complaint in this matter is comprised of 64 pages and 373 separately numbered paragraphs (See ECF No. 74) and plaintiff’s opposition to defendants’ motion to dismiss is comprised of 25 pages and 12 separate headings (See ECF No. 85). Defendants require approximately 2,000 additional words for their reply memorandum of law in order to fully address the arguments made in plaintiff’s opposition papers.

Defendants thank the Court for its consideration herein.

Respectfully submitted,

/s/

Joseph Gutmann
Senior Counsel
Special Federal Litigation Division

cc: Welton Kemilious Wisham (*By ECF*)
Counsel for Plaintiff